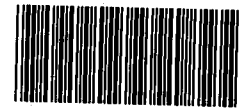




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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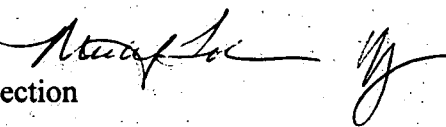


SDMS DocID 2241167

ORIGINAL

March 2, 2000

SUBJECT: Draft Action Memorandum &
Request for Sediment Removal Support
12th Street Landfill/Dump Site

FROM: Michael Towle, OSC 
Removal Response Section

TO: Michael Chezik, DOI
Peter Knight, NOAA
Chris Guy, USFWS
Bruce Pluta, EPA

Attached/enclosed is a draft of the Action Memorandum now in preparation and concurrence for a Removal Action at the 12th Street Landfill/Dump Site in Wilmington, Delaware. The Action Memorandum has been prepared considering input and information from trustee agencies to the OSC.

The Site is located along the bank of the Brandywine Creek. The near vertical Creek bank at the Site is comprised of highly contaminated soil and is now eroding into the Creek. The sediment of the adjacent tidal mudflat is contaminated in a limited area. Erosion has exposed drums buried in the contaminated soil.

The hazardous substance lead, and other inorganic substances such as arsenic, chromium, copper and zinc, are found at elevated concentrations at the Site. Toluene and phenol are also found. Lead is detected at significantly elevated concentrations and is, by far, the most pervasive contaminant. Lead in the soil is detected at concentrations up to 264,000 mg/kg, in the eroded Creek bank at concentrations up to 33,500 mg/kg, and in the tidal mudflat at concentrations up to 19,500 mg/kg. The sediment contamination levels exceed potentially protective levels (e.g., NOAA screening guidelines) by two orders of magnitude.

The extent of lead contaminated soil is now delineated by EPA at the conclusion of the Removal Site Evaluation. EPA, USFWS, NOAA, and DNREC involvement to date indicate that action is necessary to protect the aquatic environment. The attached Action Memorandum proposes actions and cleanup levels for the contaminated media.

ORIGINAL

EPA proposes to initiate a Removal Action to reduce sediment lead concentrations to average levels less than 91.3 mg/kg in the mudflat adjacent to the Site using a vacuum truck. The affected mudflat area is about 300 linear feet and about 20 feet wide. The contaminated bank and soil areas will be covered to minimize erosion into the Creek. The contaminated soil, bank, and mudflat area will be isolated from the Creek during the Removal Action to prevent migration of contaminants into the Creek. The area will be revegetated to minimize erosion. The threats and proposed actions are summarized in the attached Action Memorandum.

Consistent with EPA procedures on implementing FY2000 Appropriations Report Language on sediment dredging, EPA will need to justify that removal of sediment is necessary to mitigate a substantial threat to the environment. To date, EPA has not received definitive correspondence from trustees regarding this issue, but has received verbal information supporting the need for action. This memo requests trustee support for removal of contaminated sediment in a limited area of the mudflat to mitigate a substantial threat to the aquatic environment. Your immediate reply is requested.

Any comment on the draft Action Memorandum must similarly be immediately received. Thank you for your timely assistance.

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